

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
AT KNOXVILLE**

ANDREW JOSTEN LOVINGOOD,

Plaintiff,

v.

No. 3:19-cv-00009

**BILL JOHNSON, DERRICK GRAVES;
And MONROE COUNTY, TENNESSEE;**

Defendants.

MOTION FOR SUMMARY JUDGMENT

Comes the Defendant Monroe County, Tennessee by and through counsel, and respectfully moves the court pursuant to Fed. Rule Civ. Pro. 56 for the entry of an Order granting it summary judgment against Plaintiff, Andrew Lovingood. In support of this Motion, Defendant Monroe County, Tennessee submits a Concise Statement of Material Facts and a Memorandum of Facts and Law.

WHEREFORE, Defendant Monroe County, Tennessee¹, respectfully requests that its Motion for Summary Judgment be granted.

RESPECTFULLY SUBMITTED this 16th day of November, 2020.

¹ Monroe County, Tennessee is the sole movant in the instant motion as it is anticipated that Plaintiff could present genuine issues of material fact which could prevent the entry of summary judgment and therefore Mr. Johnson not participating in the instant Motion. Defendant Graves is represented by other counsel.

s/ Arthur F. Knight, III
Arthur F. Knight, III, BPR #016178
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CERTIFICATE OF SERVICE

I hereby certify that on November 16, 2020, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by U.S. Mail. Parties may access this filing through the Court's electronic filing system.

s/Arthur F. Knight, III
Arthur F. Knight, III